

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EPIC GAMES, INC.,

Plaintiff, Counter-
defendant

v.

APPLE INC.,

Defendant,
Counterclaimant.

Case No. 4:20-cv-05640-YGR-TSH

**[PROPOSED] ORDER RE: DEFENDANT
APPLE INC.'S ADMINISTRATIVE
MOTION TO PARTIALLY SEAL EXPERT
WRITTEN DIRECT TESTIMONY**

Pursuant to Civil Local Rule 79-5, Defendant Apple Inc. has filed an Administrative Motion to Partially Seal Expert Written Direct Testimony (the “Motion”). In support, Defendant Apple Inc. (“Apple”) filed the supporting declaration of Rachel S. Brass.

Having considered the Motion, all associated declarations, exhibits, and any argument of counsel, and for good cause appearing:

IT IS HEREBY ORDERED that the Motion is **GRANTED**. Accordingly,

(1) The unredacted versions of the documents sought to be sealed by the Motion shall remain under seal;

(2) The public shall have access only to the versions of the documents sought to be sealed by the Motion in which the following portions have been redacted:

Document or Portion of Document Sought to be Sealed	Reason for Redaction / Evidence Offered in Support	Ruling
Hitt ¶ 61	Contains non-public financial information that, if disclosed, would put Apple at a competitive disadvantage (Brass Decl. ¶¶ 6–8)	
Hitt ¶ 117	Contains non-public financial information that, if disclosed, would put Apple at a competitive disadvantage (Brass Decl. ¶¶ 6–8)	
Hitt ¶ 187	Contains non-public financial information that, if disclosed, would put Apple at a competitive disadvantage (Brass Decl. ¶¶ 6–7, 10)	
Hitt Figure 22	Contains non-public financial information that, if disclosed, would put Apple at a competitive disadvantage (Brass Decl. ¶¶ 6–8)	
Hitt Figure 27	Contains non-public financial information that, if disclosed, would put Apple at a competitive disadvantage (Brass Decl. ¶¶ 6–8)	
Hitt Figure 47	Contains non-public financial information that, if disclosed, would put Apple at a competitive disadvantage (Brass Decl. ¶¶ 6–7, 10)	

Schmalensee ¶ 95	Contains non-public financial information that, if disclosed, would put Apple at a competitive disadvantage (Brass Decl. ¶¶ 6–7, 9)	
Schmalensee ¶ 170	Contains non-public financial information that, if disclosed, would put Apple at a competitive disadvantage (Brass Decl. ¶¶ 6–8)	

IT IS SO ORDERED.

DATED: _____, 2021

The Honorable Yvonne Gonzalez Rogers
United States District Judge